



OREGON TRAWL COMMISSION

P. O. Box 569 • Astoria, OR 97103-0569
Phone (503) 325-3384 • Fax (503) 325-4416
Web Site: www.ortrawl.org

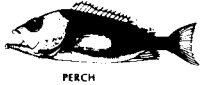
DEPT. OF TRANSPORTATION
DOCKETS

2003 AUG -5 P 12:21

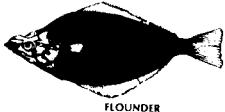
250918

USCG - 2003 - 14878 - 41

Automatic Identification System:
Expansion of Carriage Requirements
for U.S. Waters



PERCH



FLounder



COD



SOLE



SNAPPER



SHRIMP

The Oregon Trawl Commission (OTC) is a commodity commission under the Oregon Department of Agriculture. We have as members all the trawl vessels that land their catch in the State of Oregon (groundfish, shrimp, scallops). Most of the vessels are owned by family businesses that are small by definition. The majority of our members vessels are over the 65 foot length and would be affected by your proposed rule at some time.

We believe that the Coast Guard's proposed interim rule implementing the Automatic Identification System (AIS) requirements of the Maritime Transportation Security Act (MTSA) will result in costs on vessels operating in the fisheries off Washington, Oregon and California that are all out of proportion to any benefit that might be gained. As we understand the law, the Coast Guard has the authority to exempt vessels from the AIS requirement where AIS equipment is not needed for safe navigation. We believe that the Coast Guard should use this authority and exempt the fishing vessels along the West Coast of the U.S. While there are some vessels that are in transit in the VTS areas on Puget Sound, San Francisco, and Long Beach, it appears to us that the cost is all out of proportion to the gain.

As written it could require most of the vessels that are members of the OTC to obtain the equipment. The National Marine Fisheries Service is in the process of making it mandatory for all of our member vessels who fish groundfish to have a Vessel Monitoring System on board this year. As we understand it, this equipment would not meet the requirements of what the Coast Guard is proposing. How about the two agencies getting together and both using the same kind of tracking equipment.

At a cost of about \$10,000 per vessel, we are looking at a total cost of \$2,000,000 for our members. Meanwhile the analysis done by the Coast Guard makes it clear the cost of the AIS requirement to domestic non-SOALS vessels (like our members vessels) is out of wack as far as any benefits to be gained. The cost for the first year to implement the AIS for domestic non-SOALS vessels is estimated at \$38 million out of a total cost for all U.S. flag vessels of \$40 million, while the estimated "safety benefit" to be realized by these vessels is only \$2 million. In contrast the cost to implement AIS for U.S. flag SOLAS fleet is only \$2 million.

OREGON TRAWL - EXCELS ALL

The estimate of benefit is \$13 million . 68 Fed Reg. at 39359. It seems to us that the Coast Guard has pointed out the benefits in relation to the cost are not to be had. In fact the Coast Guard, in its Federal Register notice states "Strictly upon consideration of monetized safety benefits... the cost of AIS installation for the domestic fleet far outweighs the benefit over a 15 year period (0.26 benefit-cost ratio).

For vessels that only transit VTS areas occasionally the cost/benefit is even more extreme.

The MTSA makes clear that the purpose of the AIS requirement is to enhance vessel safety. The MTSA authorizes the Secretary of Homeland Security to exempt a vessel "if the Secretary finds that an automatic identification system is not necessary for the safe navigation of the vessel on the waters on which the vessels operates." While vessels can be exempted by the Secretary on safety considerations alone, it is clear the propose of the AIS requirement is to enhance vessel safety. This leads us to question the "security benefits" of the AIS requirement are really relevant to the AIS rule, since the core reason for the AIS requirement is navigation safety, not security

In conclusion, the MTSA requires installation of AIS equipment on commercial vessels 65 ft. and greater in length, MTSA also authorizes the Coast Guard to exempt vessels from the requirement "if the Secretary finds that an automatic identification system is not necessary for the safe navigation of the vessel." It seems to us that the Coast Guard has a responsibility to exempt vessels from the AIS requirement, that will not gain significant safety benefits from AIS equipment. This would include the vessels of our members.

Thank you for consideration of our views.

Joe Easley



Administrator

cc: Senator Smith
Senator Wyden
Representative DeFazio
Representative Hooley
Representative Walden
Representative Wu